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18 *Attorneys for Defendant/Counterclaimant*
19 *Ivan Tapia and Defendants Angela Cruikshank,*
20 *Jeff Cruikshank, and Justin Owens*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 INTERNATIONAL MARKETS LIVE INC.,
16 a New York corporation dba IM MASTERY
ACADEMY,

17 Plaintiff,

18 | v

19 DAVID IMONITIE an individual; SPELA
20 SLUGA, an individual; DEVON ROESER,
21 an individual; IVAN TAPIA, an individual;
22 NVISIONU, INC., a Delaware corporation;
23 ILYKIT, LLC, a Utah limited liability
company, LUCAS LONGMIRE, an
individual; NATHAN SAMUEL, an
individual; MICHAEL ZHOR, an individual;
24 IMRAN RICHIE, an individual; JUSTIN
OWENS, an individual; PAULO
25 CAVALLERI, an individual; JOSE
MIGUEL CONTREAS, an individual; BASS
26 GRANT, an individual; ANGELA
CRUIKSHANK, an individual; JEFF
27 CRUIKSHANK, an individual; VINCE
MURPHY, an individual; GARY
28 MCSWEEN, an individual; KATRINA

Case No.: 2:22-CV-01863-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION OF TIME FOR
FILING OF DEFENDANTS' REPLIES TO
PLAINTIFF'S RESPONSES TO
DEFENDANTS' MOTIONS TO DISMISS
(ECF NOS. 168 AND 169) (FIRST
REQUEST)**

1 WORGESS, an individual; LUIS
2 RONALDO HARNANDEZ ARRIAGA, an
3 individual; STEPHANIA AYO, an
4 individual; SILVIA AYO, an individual;
5 CATALINA VASQUEZ, an individual;
6 MATHIAS VASQUEZ, an individual;
7 DOES 1 through 10, inclusive; and ROE
8 CORPORATIONS I through X, inclusive,

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10 Defendants.

11 AND ALL RELATED MATTERS

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STIPULATION AND [PROPOSED] ORDER

23 Defendants Angela Cruikshank, Jeff Cruikshank, and Justin Owens (“Defendants”), and
24 Plaintiff International Markets Live, Inc. dba IM Mastery Academy (“Plaintiff”), (collectively, the
25 “Parties”) by and through their respective undersigned counsel of record, the law firms of Slighting
26 Law, James Dodge Russell & Stephens PC, Kerr Simpson Attorneys at Law, and Holland & Hart
27 LLP, hereby stipulate and agree to extend the deadline for Defendants to file their Replies to
28 Plaintiff’s Responses to Defendants’ Motions to Dismiss (ECF. Nos. 168 and 169; filed 5/12/23).
29 This is the first stipulation between the Parties to extend the time for Defendants to reply to
30 Plaintiff’s Responses to Defendants’ Motions to Dismiss. The Parties hereby specifically agree and
31 stipulate as follows:

32 WHEREAS, on May 1, 2023, Defendants Angela Cruikshank and Jeff Cruikshank filed
33 their Motion to Dismiss Plaintiff’s First Amended Complaint (ECF No. 47) Pursuant to FRCP
34 12(b)(2) for Lack of Personal Jurisdiction (ECF No. 156).

35 WHEREAS, on May 1, 2023, Defendant Justin Owens filed his Motion to Dismiss
36 Plaintiff’s First Amended Complaint (ECF No. 47) Pursuant to FRCP 12(b)(2) for Lack of Personal
37 Jurisdiction (ECF No. 157).

1 WHEREAS, on May 12, 2023, Plaintiff filed its Responses to Defendants' Motions to
2 Dismiss (ECF Nos. 168 and 169).

3 WHEREAS, on May 18, 2023, counsel for the Parties met and conferred via telephone and
4 agreed to allow Defendants an additional one (1) week of time from the current due date of May
5 19, 2023 to file their Replies to Plaintiff's Responses to Defendants' Motions to Dismiss, thereby
6 making such Replies due May 26, 2023.
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8 WHEREAS, no parties oppose the extension of time for the filing of Defendants' Replies to
9 Plaintiff's Responses to Defendants' Motions to Dismiss as set forth herein.

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1 THEREFORE, the Parties jointly stipulate that the Court should enter an order allowing
2 Defendants to file their Replies to Plaintiff's Responses to Defendants' Motions to Dismiss by May
3 26, 2023.

4 Respectfully submitted, this 19th day of May 2023

5 **SLIGHTING LAW**

6 /s/ Bradley S. Slighting

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5 **WELLMAN AND WARREN LLP**

6 /s/ Chris Wellman

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17 **HOLLAND & HART LLP**

18 /s/ Jenapher Lin

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18 /s/ Jon E. Field

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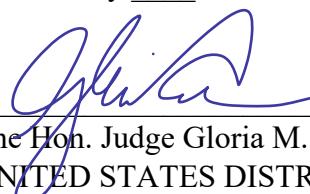
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22 *Attorneys for Defendant ILYKIT, LLC*

23 **IT IS SO ORDERED.**

24 Dated: May 22, 2023.

25 
26 The Hon. Judge Gloria M. Navarro
27 UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of May, 2023, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING OF DEFENDANTS' REPLIES TO PLAINTIFF'S RESPONSES TO DEFENDANTS' MOTIONS TO DISMISS (ECF NOS. 168 AND 169) (FIRST REQUEST)** was filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to and served electronically upon the following counsel:

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